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March 15, 2010

*By Electronic Filing*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Williams Sound Corp. Petition for Declaratory Ruling,  
ET Docket No. 10-26  
Reply Comments**

Dear Ms. Dortch:

On behalf of the Hearing Loss Association of America ("HLAA"), Deaf & Hard of Hearing Consumer Advocacy Network (DHHCAN), National Association of the Deaf (NAD), and Telecommunications for the Deaf & Hard of Hearing (TDI) ("Consumer Groups"), I am pleased to submit these reply comments in support of the Williams Sound Corporation's Petition for Declaratory Ruling requesting FCC clarification that the Part 15 auditory assistance device rules permit use in support of simultaneous language interpretation.<sup>1</sup>

Granting the Petition will lead to wider availability of auditory assistance devices, which help individuals who are hard of hearing. It will specifically facilitate communications with individuals who require both language amplification and translation. As Williams Sound explains and as others have noted in their comments, the requested clarification is consistent with FCC rules and is needed to alleviate confusion in the industry as to which types of auditory assistance devices can support simultaneous language interpretation. Provided that this equipment continues to be promoted for auditory assistance, the clarification sought by Williams Sound will benefit people with hearing loss while simultaneously serving a broader audience.

HLAA is a leading consumer organization representing millions of people with hearing loss. Through our national headquarters in Bethesda, Maryland, thirteen state organizations, and nearly 200 local chapters, HLAA champions accessibility through research, advocacy, public policy, and public awareness relating to hearing loss on both national and global levels. HLAA's mission is to open the world of communication to people with hearing loss by providing information, education, advocacy, and support. We deliver cutting-edge information to consumers, professionals, and family members through our

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<sup>1</sup> See FCC Public Notice, *Office Of Engineering And Technology Declares The Williams Sound Corporation Petition For Declaratory Ruling Regarding Part 15 Auditory Assistance Devices In The 72-76 MHz and 902-928 MHz Bands to be a "Permit-But-Disclose" Proceeding For Ex Parte Purposes and Requests Comments*, ET Docket No. 10-28, DA No. 10-129 (Jan. 26, 2010), erratum rel. Jan. 29, 2010, to change the docket number to ET Docket No. 10-26.



website, [www.hearingloss.org](http://www.hearingloss.org), our award-winning electronic publication, Hearing Loss, and national and regional conventions.

DHHCAN, established in 1993, serves as the national coalition of organizations representing the interests of deaf, hard of hearing, late-deafened and deaf-blind citizens in public policy and legislative issues relating to rights, quality of life, equal access, and self-representation. DHHCAN also provides a forum for proactive discussion on issues of importance and movement toward universal, barrier-free access with emphasis on quality, certification, and standards.

The NAD was established in 1880 by deaf leaders who believed in the right of the American deaf community to use sign language, to congregate on issues important to them, and to have its interests represented at the national level. As a nonprofit federation, the mission of the NAD is to preserve, protect, and promote the civil, human, and linguistic rights of deaf Americans. The advocacy scope of the NAD is broad, covering the breadth of a lifetime and impacting future generations in the areas of early intervention, education, employment, health care, technology, telecommunications, youth leadership, and more.

TDI provides leadership in achieving equal access to telecommunications, media, and information technologies for 37 million Americans who are deaf or hard of hearing. TDI publishes the TDI World quarterly magazine, TDI Briefs newsletter, and the annual TDI National Directory & Resource Guide, also called the "Blue Book."

As noted in the Williams Sound Petition and in many of the comments, individuals with hearing loss who need simultaneous language translation will benefit from the availability of devices that support such use. In addition, FCC clarification of the permissible uses of auditory assistive technology will benefit people who are hard of hearing – a group that inevitably will include some overlap with those who also need language interpretation.

In this way, the requested clarification unquestionably advances the missions of the consumer groups to help all communities of people with hearing loss. By way of example, equipping places of public assembly such as houses of worship with wireless devices that can carry programs spoken in the language of the presentation and in the language of the interpretation will benefit a broader population of individuals with hearing difficulties. With regard to the multichannel units at issue in the Petition, in particular, a Spanish speaking congregation may use one channel to transmit the service in Spanish and a separate channel to transmit a near-simultaneous language interpretation of the service in English for the benefit of others who have difficulty understanding Spanish. Both groups likely will have listeners who benefit from the sound amplification that the technology provides.

Moreover, as Williams Sound points out, allowing use in this manner will permit the presenter to complete the presentation in less time or cover additional material in the same amount of time. In addition, having multichannel receivers that can be switched from one audio feed to another will better serve the day-to-day demands in places of public gathering as the population of users changes. Consider, in this regard, a museum tour guide system that serves tour groups from countries like France, Germany, Japan, and Korea every day.



At the same time, consumers are well aware that the available frequency bands in the spectrum are precious “real estate” and are a limited resource. Any ruling must be clear: industry must not be permitted to use those bands for purposes other than for their designated use so that people who have a hearing loss will be assured that they will continue to be able to benefit from auditory assistive devices.

The Commission should promote accessibility by opening the world of communication to all individuals who require auditory assistance, including those who will benefit from simultaneous language translation. Granting the Williams Sound Petition will increase accessibility of auditory assistance devices and provide assistance to more individuals who need help understanding a presentation.

For these reasons, the Commission should grant the Petition expeditiously.

Sincerely,

*Brenda Battat*

Brenda Battat  
Executive Director  
Hearing Loss Association of America  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Cheryl Heppner  
Vice Chair  
Deaf and Hard of Hearing Consumer Advocacy  
Network  
3951 Pender Drive, Suite 130  
Fairfax, VA 22030

Nancy J. Bloch  
Chief Executive Officer  
National Association of the Deaf  
8630 Fenton Street, Suite 820  
Silver Spring, MD 20910

Claude L. Stout  
Executive Director  
Telecommunications for the Deaf and Hard of  
Hearing (TDI)  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

cc: Patrick Forster – [patrick.forster@fcc.gov](mailto:patrick.forster@fcc.gov)  
Best Copy and Printing, Inc. – [fcc@bcpi.web.com](mailto:fcc@bcpi.web.com)